

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

SCHNUCK MARKETS, INC.,)	
)	
Plaintiff,)	
)	
v.)	No. 4:13-cv-2226-JAR
)	
FIRST DATA MERCHANT DATA)	
SERVICES CORP. AND CITICORP)	
PAYMENT SERVICES, INC.,)	
)	
Defendants.)	

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE DEFENDANTS' REPLY MEMORANDUM
IN FURTHER SUPPORT OF MOTION FOR PARTIAL
RECONSIDERATION OF ORDER GRANTING PLAINTIFF'S
PARTIAL CROSS-MOTION FOR JUDGMENT ON THE PLEADINGS
OR, IN THE ALTERNATIVE, MOTION FOR LEAVE TO AMEND PLEADINGS**

First Data Merchant Services Corp. and Citicorp Payment Services, Inc. (collectively, "Defendants"), with the consent of Plaintiff Schnuck Markets, Inc. ("Plaintiff"), hereby respectfully move for a brief extension of time in which to file their Reply Memorandum in Further Support of their Motion for Partial Reconsideration of Order Granting Plaintiff's Partial Cross-Motion for Judgment on the Pleadings or, in the Alternative, Motion for Leave to Amend Pleadings ("Reply Memorandum") and in support thereof state as follows:

1. Defendants' Reply Memorandum is due on or before March 9, 2015.

2. Defendants respectfully request a one week extension of time, through March 16, 2015, in which to file their Reply Memorandum.

3. Counsel for Plaintiff has consented to this request.

4. Granting Defendants' request for a modest extension of time will not prejudice Plaintiff and will not meaningfully delay the progress of this litigation.

WHEREFORE, Defendants respectfully request an extension of time through March 16, 2015 in which to file their Reply Memorandum. A proposed order to that effect is attached hereto as Exhibit "1."

Dated: March 5, 2015

Respectfully submitted,

/s/ Edward Soto

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***Counsel for Defendants/Counterclaim-
Plaintiffs First Data Merchant Data Services
Corporation and Citicorp Payment Services
Incorporated***

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was filed electronically with the Clerk of the Court of the United States District Court for the Eastern District of Missouri using CM/ECF on March 5, 2015 and, as such, was served on all parties of record by operation of the CM/ECF system.

By: /s/ P. Christine Deruelle

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